

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KATIE HENNESSEY,)	
)	
Plaintiff,)	
)	Cause No. _____
v.)	(formerly pending as Case No.
)	1822-AC09907 in the Associate
UNITED FOOD AND COMMERCIAL)	Circuit Court of St. Louis City, Missouri)
WORKERS, LOCAL 655 BUILDING)	
CORPORATION,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1367(a), 1441, and 1446, defendant United Food and Commercial Workers, Local 655 Building Corporation, files this Notice of Removal of this action from the Associate Division of the 22nd Judicial Court, in which it is now pending, to the United States District Court for the Eastern District of Missouri. Removal is proper because this Court has original jurisdiction over claims arising under the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“the TCPA”). Mims v. Arrow Financial Services, LLC, 565 U.S. 368 (2012). In accordance with 28 U.S.C. § 1367(a), this Court also has supplemental jurisdiction over the plaintiff’s state-law invasion of privacy claim, which claim depends solely on the plaintiff’s receipt of phone calls and texts allegedly made in violation of the TCPA.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was electronically filed with the Clerk of the Court on September 20, 2018, and was served via U.S. Mail on the following counsel of record:

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/s/ Janine M. Martin